

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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THEODUS JORDAN

Plaintiff,

v.

BOSTON PUBLIC SCHOOLS

Defendant

U.S. DISTRICT COURT  
DISTRICT OF MASS.  
Civil Action No.  
04-cv-10688NMG

**DEFENDANT, BOSTON PUBLIC SCHOOLS' FIRST SET OF  
INTERROGATORIES TO PLAINTIFF**

Defendant, Boston Public Schools, pursuant to Rule 33 of the Federal Rules of Civil Procedure, requests that Plaintiff, Theodus Jordan, answer the following Interrogatories. Answers are to be made under oath and served within forty-five (45) days of receipt upon Andrea Alves Thomas, Esq., Assistant Corporation Counsel, 26 Court Street, 7<sup>th</sup> Floor, Boston, Massachusetts 02108.

**Definitions and Instructions**

1. Each Interrogatory must be answered upon Plaintiff's entire knowledge available from all sources, including all information in Plaintiff's possession or that of his/her agents.
2. If you contend that any requested information is privileged or otherwise not subject to discovery, please state the grounds upon which you contend that the information is not subject to discovery and all facts relied upon in support of your claim.

3. Unless otherwise specified, each Interrogatory shall cover the time period from January 1, 1993 to the present. *only from 1993?*
4. This request shall be deemed continuing so as to require prompt further and supplemental or amended production if the Plaintiff locates or obtains possession, custody or control of additional responsive information at any time prior to the conclusion of trial.
5. The term "identify" when used in reference to a person means to give the full name of the person, current or last known residential address, his/her occupation, title or position, and his/her employer's name and address.
6. The term "person" as used herein means any natural person, or any firm, association, partnership, corporation or other entity.
7. The term "communication" means any transmittal of information (in the form of facts, ideas, inquiries or otherwise) and any response thereto, and includes but is not limited to any inquiries or otherwise) and any response thereto, and includes but is not limited to any telephone conversation, face-to-face meeting or conversation, visit, conference, discussion, or exchange of any document.
8. The term "Plaintiff" as used herein shall mean Theodus Jordan, including any agent acting on his behalf.
9. The term "Defendant" as used herein means Boston Public Schools, their agents, servants, employees, supervisors, officers, representatives, and all other persons or entities acting on their behalf.
10. The terms "you" and "your" are used herein to refer to Plaintiff.

11. The term "Complaint" means the Complaint filed on the Plaintiff's behalf on or about March 28, 2004, with the Federal Court, Civil Action No. 04-cv-10688NMG.

**Interrogatories**

Interrogatory No. 1: Please identify all persons who compiled and/or prepared, assisted in preparing, and/or provided information and/or documentation in anticipation of the herein contained answers to interrogatories.

Interrogatory No. 2: Please identify all witnesses and/or persons having knowledge of the claims, allegations and/or incidents set forth in the Plaintiff's Complaint and for each individual state in detail a complete description of the discoverable matter of which each individual has knowledge.

Interrogatory No. 3: Please identify all persons whom the Plaintiff or the Plaintiff's attorneys intend to call as witnesses and/or expert witnesses at the trial of this matter, stating as to each such witness the substance of the facts and opinions to which each such witness is expected to testify and a summary of the grounds for each opinion of each such witness and/or expert witness.

Interrogatory No. 4: Please set forth, based on your personal knowledge, a complete and detailed account of all facts upon which you base each and every allegation contained in your Complaint, including but not limited to the source (i.e. name of witness, document, etc.) of the facts you provide.

Interrogatory No. 5: Please describe **in detail** each action that Defendant did or failed to do which you believe was an act of discrimination against you as alleged in the Complaint, including in your answer, the name of the individual(s) involved and the date, time, location, and nature of said alleged discrimination.

Interrogatory No. 6: Please describe in detail each action that Defendant did or failed to do which you believe was an act of retaliation against you, including in your answer, the name of the individual(s) involved and the date, time, location, and nature of said alleged retaliation.

Interrogatory No. 7: Identify each person with whom you have communicated regarding the events that are described in the Complaint, including the content of such communication.

Interrogatory No. 8: Identify on what date you received Notice of Dismissal regarding Charge No. 16C-2002-00304 from the Equal Employment Opportunity Commission .

Interrogatory No. 9: Identify all sources of income received by Plaintiff, whether earned or unearned, from January 1, 2002 to the present, specifically identifying the name, address of the source, the dates you received such compensation, and the amount of compensation you received.

Interrogatory No. 10: Identify all doctors, psychiatrists, psychologists, social workers, counselors and other health care professionals with who you have consulted or treated, or been under the care of, from January 1, 1993 to the present. Specifically, identify:

(a) the identity of the health care professional;

(b) the dates of consultation, treatment or care;

(c) a description of the treatment or care you received; and

(d) the diagnosis and prognosis made of your condition.


Interrogatory No. 11: Please describe in detail all damages, whether pecuniary, physical or emotional, you claim to have suffered as a result of the events described in the Complaint.

Interrogatory No. 12: If you claim you have suffered any financial loss as a result of the incident(s) alleged in your Complaint, please list and itemize the total dollar amount of financial loss of any nature including but not limited to any lost wages and/ or physician's bills as well as the type and amount of compensation Plaintiff seeks from Defendant.

Date:

Defendant, City of Boston  
By its Attorney,  
William F. Sinnott  
Corporation Counsel

By:

  
Andrea A. Thomas, BBO #660050  
Assistant Corporation Counsel  
Boston Public Schools  
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